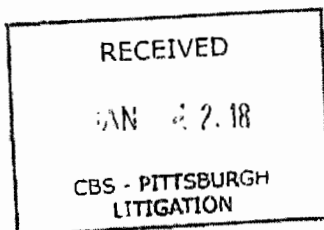


## **EXHIBIT A**



By: Edward M. Nass  
E-mail: emnass@ncblawfirm.com  
Identification No. 34588  
NASS CANCELLIERE BRENNER  
1515 Market Street, Suite 2000  
Philadelphia, PA 19102  
(215) 546-8200

Attorneys for Plaintiff,

ASSESSMENT OF DAMAGES HEARING  
IS REQUIRED  
NON-JURY

KENNETH E. BRADLEY and KATHLEEN  
BRADLEY, h/w  
956 Shackamoxon Street  
Philadelphia, PA 19125

COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY

Dec TERM, 2017  
NO. 3217

VS.

HONEYWELL INTERNATIONAL, INC., as  
successor in interest to Allied Signal, Inc., as successor  
in interest to Bendix Corporation  
Columbia Road & Park Avenue  
Morristown, NJ 07960 (CONT'D)

**CIVIL ACTION - COMPLAINT**  
**(Personal Injury - 2090 Asbestos)**  
**NOTICE TO DEFEND**

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

*You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.*

Philadelphia Bar Association  
Lawyer Referral and Information Service  
One Reading Center  
Philadelphia, Pennsylvania 19107  
(215) 238-6333

**AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas espuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

*Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagurial servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.*

Asociacion de Licenciados de Filadelfia  
Servicio de Referencia e Informacion Legal  
One Reading Center  
Filadelfia, Pennsylvania 19107

Aurora Pump  
13320 Ballantyne Corporate Place  
Charlotte, NC 28277  
Attention: Lynette Jones

A.W. Chesterton, Inc.  
860 Salem Street  
Groveland, MA 01834

Bayer Cropscience, as successor to  
~~AMCHEM Products, Inc.~~  
(Benjamin Foster Division)  
2 TW Alexander Drive  
Research Triangle Park, NC 27709

Borg Warner Morse TEC LLC, as successor-  
by-merger to Borg-Warner Corporation  
CT Corporation  
1209 Orange Street  
Wilmington, Delaware 19801

Bridgestone /Firestone North American  
Tire, LLC  
successor to Bridgestone/Firestone  
535 Marriott Drive  
Nashville, TN 37214

Air and Liquid Systems Corp, as successor  
by merger to Buffalo Pumps, Inc.  
c/o C.T. Corporation  
600 N. 2<sup>nd</sup> Street, Suite 401  
Harrisburg, PA 17101

Carlisle Corp.  
c/o Prentice Hall Corp.  
2595 Interstate Drive, Suite 103  
Harrisburg, PA 17110

Carrier Corporation  
Carrier Parkway  
P.O. Box 4808  
Syracuse, NY 13221

Certain-Teed Corporation  
20 Moores Road  
Malvern, PA 19355

Copes Vulcan  
Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

Crosby Valve LLC  
55 Cabot Boulevard  
Mansfield, MA 02048

Dana Companies, LLC, sued individually and  
as successor-in-interest to Victor Gasket  
Manufacturing Co.  
900 West South Boundary Street  
Building 8, Suite A  
Perrysburg, OH 43551

DAP, Inc.  
2400 Boston Street, Suite 200  
Baltimore, MD 21224

Drever Company  
124 S. York Road  
Hatboro, PA 19040

Durametallic Corporation  
2104 Factory Street  
Kalamazoo, MI 49001

Federal-Mogul Asbestos Personal Injury  
Trust, as successor to Felt Products  
Manufacturing Company  
c/o Wilmington Trust SP Services, Inc.  
1105 N. Market Street, Suite 1300  
Wilmington, DE 19801

Ford Motor Company  
c/o C.T. Corporation Systems  
600 N. 2<sup>nd</sup> Street, Suite 401  
Harrisburg, PA 17101

Foster Wheeler LLC  
Perryville Corporate Park  
Clinton, NJ 08809-4000

General Electric Co.  
41 Farnsworth Street  
Boston, MA 02210

Genuine Parts Co.  
c/o C.T. Corporation Systems  
600 N. 2<sup>nd</sup> Street, Suite 401  
Harrisburg, PA 17101

Goulds Pumps Inc., n/k/a Goulds Pumps LLC ✓  
240 Fall Street  
Seneca, NY 13148

Greene, Tweed & Co.  
c/o Greene, Tweed NC, LLC  
227 West Trade Street, Suite 2170  
Charlotte, NC 28202

IMO Industries, Inc., individually, and as  
successor to DeLaval Steam Turbine  
Company  
c/o The Corporation Trust Company  
1209 Orange Street  
Wilmington, DE 19801

Ingersoll-Rand Company  
Corporate Center  
One Centennial Avenue  
Piscataway, NJ 08854

John Crane, Inc., f/k/a Crane Packing  
Company  
6400 W. Oakton Street  
Morton Grove, IL 60053

Kelsey Hayes Co.  
12001 Tech Center Drive  
Livonia, MI 48150-1332

Keeler/Dorr-Oliver Boiler Co.  
c/o Walter S. Jenkins, Esquire  
Three Logan Square  
1717 Arch Street, Suite 3710  
Philadelphia, PA 19103-2832

Arvin Meritor, Inc., as successor in interest to  
former automotive products division of  
Rockwell International Corporation ✓  
2135 West Maple Road  
Troy, MI 48084

Metallo Gasket Company  
16 Bethany Street  
New Brunswick, NJ 08903

Metropolitan Life Insurance Co.  
200 Park Avenue  
New York, NY 10166

Milwaukee Valve Company  
16550 West Stratton Drive  
New Berlin, WI 53151-7301

Pecora Corporation  
165 Wambold Road  
Harleysville, PA 19438

Pep Boys  
c/o Jennifer W. Darger, Esq.  
Darger Errante Yavitz & Blau LLP  
116 East 27th Street at Park Avenue  
12th Floor  
New York, New York 10016

Pneumo-Abex Corp., successor in  
interest to Abex Corporation  
c/o Prentice Hall Corp. System  
2595 Interstate Drive, Suite 103  
Harrisburg, PA 17110

Trane US Inc., f/k/a American Standard, Inc.  
One Centennial Avenue  
Piscataway, NJ 08855

Union Carbide Corporation  
c/o C.T. Corporation Systems  
600 N. 2<sup>nd</sup> Street, Suite 401  
Harrisburg, PA 17101

Warren Pumps LLC  
82 Bridges Avenue  
Warren, MA 01083

CBS Corporation, a Delaware Corporation,  
f/k/a Viacom Inc. successor by merger to  
CBS Corp., as Pennsylvania Corporation,  
f/k/a Westinghouse Electric Corp. }  
20 Stanwix Street  
Pittsburgh, PA 15222

**By: Edward M. Nass**  
**E-mail: <mailto:emnass@hbnpcclaw.com>**  
**Identification No. 34588**  
**NASS CANCELLIERE BRENNER**  
**1515 Market Street, Suite 2000**  
**Philadelphia, PA 19102**  
**(215) 546-8200**

**Attorneys for Plaintiff,**

**ASSESSMENT OF DAMAGES**  
**HEARING IS REQUIRED**  
**NON-JURY**

KENNETH E. BRADLEY and KATHLEEN  
BRADLEY, h/w  
956 Shackamoxon Street  
Philadelphia, PA 19125

COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY

TERM,  
NO.

vs.

HONEYWELL INTERNATIONAL, INC., as  
successor in interest to Allied Signal, Inc., as successor  
in interest to Bendix Corporation  
Columbia Road & Park Avenue  
Morristown, NJ 07960 (CONT'D)

**SHORT FORM COMPLAINT**

Plaintiff incorporates by reference Plaintiff's Master Long Form Complaint In Re: Asbestos  
Litigation in Philadelphia Court of Common Pleas, filed as of October Term, 1986, No. 8610-0001.  
Pursuant to an Order dated July 30, 1986 and signed by the Honorable Richard B. Klein and the  
Honorable Edward J. Blake the following Short Form Complaint is utilized in this asbestos action.

1. This Complaint involves the claims for the following persons:

(a) Plaintiff

Name: Kenneth E. Bradley

Address: 956 Shackamoxon Street  
Philadelphia, PA 19125

Social Security Number: XXX-XX-7634

Date of Birth: 10/15/1951

(b) Spouse: Kathleen Bradley

2. The Defendants are those companies identified in the caption of this Complaint.

3. Plaintiff's employment history is as follows:

Employer: U.S. Army  
Years: 1971 - 1975  
Job Title: Motor Pool

Employer: Philadelphia Naval Shipyard  
Years: 1975 - 1996  
Job Title: Laborer, Shipfitter, Manager

Employer: Sunoco Gas Station Franchise  
Years: 1996 - 1998  
Job Title: Owner, Operator

Employer: Philadelphia Water Department  
Years: 2001 - 2014  
Job Title: Industrial Hygienist

4. Plaintiff was exposed to asbestos during portions of his service in the U.S. Army and his employment for the Philadelphia Naval Shipyard. Plaintiff was also exposed to asbestos performing motor vehicle and home improvement work. Discovery and investigation is continuing as to whether the plaintiff was exposed to asbestos in any other occupational settings or non-occupational settings.

5. Defendant, Ford Motor Company, is a corporation qualified to do business, and regularly conducts business, in the Commonwealth of Pennsylvania, as well as in Philadelphia County, and can be served in Pennsylvania through its registered agent, C.T. Corporation Systems, 600 N. 2<sup>nd</sup> Street, Suite 401, Harrisburg, PA 17101. Defendant, Ford Motor Company, manufactured, produced, sold, and/or supplied, either directly or indirectly, asbestos-containing products and/or vehicles or other equipment calling for the use of asbestos-containing products

including, but not limited to, asbestos-containing friction products such as brakes, clutches, and/or gaskets, to which the plaintiff was exposed while performing, assisting, and/or working in the vicinity of motor vehicle work.

6. Plaintiff was diagnosed on or about November 18, 2016, as suffering from pulmonary asbestosis. Plaintiff suffers from pulmonary impairment and disability causally related to asbestos exposure and asbestos disease with symptoms, including but not limited to, shortness of breath.

7. A claim for lost wages is being asserted at this time.

NASS CANCELLIERE BRENNER

BY:

EDWARD M. NASS  
Attorneys for Plaintiffs



VERIFICATION

Edward M. Nass, Esquire hereby states that he is the attorney for the plaintiff in this action, and that he makes this verification on behalf of the plaintiff herein, being authorized to do so, and verifies that the facts contained in the foregoing Civil Action- Complaint are true and correct to the best of his knowledge, information and belief. The undersigned understands that the statements herein are made subject to the penalties of 18 Pa.C.S. Sec. 4904 relating to unsworn falsification to authorities.

DATE: 12/21/17

  
\_\_\_\_\_  
EDWARD M. NASS



**IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY  
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
TRIAL DIVISION - CIVIL**

**BRADLEY ETAL VS HONEYWELL  
INTERNATIONAL, INC. ETAL**

2017 TERM DECEMBER

No. 03217

**IN RE: ASBESTOS LITIGATION - OCTOBER TERM 1986, NO. 0001**

**MASTER CASE MANAGEMENT ORDER FOR  
ASBESTOS-RELATED PERSONAL INJURY CLAIMS**

It is the goal of this Court to secure the just, expeditious and cost-effective determination of each personal injury case involving exposure to asbestos or asbestos-containing products pending or hereafter filed in the Court of Common Pleas of Philadelphia County to eliminate duplication of effort, prevent unnecessary paperwork and promote judicial economy.

In order to achieve these objectives, this 1st day of December, 2010, the Court enters the following Case Management Order for personal injury cases involving exposure to asbestos or asbestos-containing products.

This Case Management Order supersedes all prior Case Management Orders entered in the Asbestos Litigation and shall apply to all cases currently pending and hereafter filed in this Court.

**I. PLEADINGS**

**A. Short Form Complaints**

A Short Form Complaint shall be filed and served in every case in accordance with the Pennsylvania Rules of Civil Procedure. Plaintiffs may incorporate by reference the Master Long Form Complaints filed on the above-captioned docket.

The Short Form Complaint shall contain the information required by Philadelphia Civil Rule \*1019.1(B), to the extent consistent with the Pennsylvania Rules of Civil Procedure.

A Short Form Complaint that contains premises liability claims shall include the name and address of each work site in which the plaintiff alleges exposure to asbestos and the dates during which the plaintiff or the decedent worked at each such work site.

**B. Preliminary Objections**

In response to each Short Form Complaint, the defendant may file preliminary objections, if deemed appropriate, in accordance with the Pennsylvania Rules of Civil Procedure and Philadelphia Civil Rule \*1028. The preliminary objections shall be filed in letter brief format rather than motion package format. Its caption must specify "Asbestos Litigation" and name opposing counsel. Facts, issues and pertinent case law should be included. Each motion must include a proposed order.

**C. Answers to Complaints**

Defendant's answers to complaints are governed by Rule 1041.1 of the Pennsylvania Rules of Civil Procedure.

## **II. GIFFEAR DOCKET**

Cases that do not state a valid claim pursuant to Giffear v. Johns-Manville Corp., 632 A.2d 880 (Pa.Super. 1993), aff'd sub nom. Simmons v. Pacor, Inc., 674 A.2d 232 (Pa.1996), shall be placed on an inactive docket.

To reactivate a case which has been discontinued pursuant to Giffear, a Motion to Reactivate must be filed and include all necessary medical reports supporting said motion. The motion shall be filed in letter brief format consistent with the Mass Tort Motion procedures.

## **III. DISCOVERY**

The following deadlines shall apply for the completion of discovery and the exchange of expert reports:

180 Days prior to jury selection-

Plaintiffs shall serve answers to Defendants' Master Interrogatories and Requests for Production Directed to Plaintiffs, including information relating to Bankruptcy Trust Filings.

Plaintiffs shall forward the identification of all health care providers along with addresses to defense counsel and RecordTrak.

Plaintiffs shall forward HIPAA compliant authorizations signed by plaintiffs to RecordTrak.

120 days prior to jury selection-

Plaintiffs shall serve medical, economic and liability expert reports.

Plaintiffs shall produce to lead defense counsel all diagnostic materials in the possession of plaintiffs or their counsel and all diagnostic material reviewed by plaintiffs' experts. This includes, but is not limited to, x-rays, CT scans, pathology and cytology.

Plaintiffs shall serve product identification witness lists identifying the defendants the witnesses are expected to identify.

100 days prior to jury selection-- Completion of plaintiffs' depositions.

90 days prior to jury selection-- Completion of all co-worker depositions.

45 days prior to jury selection-- Defendants shall serve medical and economic expert reports.

10 days prior to jury selection-- Defendants shall serve expert liability reports.

## **IV. STIPULATIONS OF DISMISSAL**

1. If a plaintiff has agreed to stipulate to the dismissal of a defendant, the defendant (hereinafter the "Stipulated Defendant") shall prepare a Stipulation of Dismissal.
2. The Stipulated Defendant shall circulate the Stipulation of Dismissal to all defense

counsel by letter, stating that any party has ten (10) days from the date of the letter to object to the dismissal of the Stipulated Defendant.

3. If a party objects to the dismissal of the Stipulated Defendant, the objecting party shall notify the Stipulated Defendant in writing of the basis for the objection.

4. If, after the expiration of the ten (10) day period, no objections are received by the Stipulated Defendant, the Stipulation of Dismissal may be electronically filed with the Court as unopposed.

5. The package electronically filed with the Court shall include the signed Stipulation of Dismissal and a cover letter stating no objections have been raised within the ten (10) day period.

6. Service of the Court-approved Stipulation of Dismissal shall be effectuated via the Court's electronic filing system on all parties of record.

## **V. MOTION PRACTICE AND PROCEDURE**

All summary judgment motions shall be filed in accordance with the Revised Asbestos Summary Judgment Motion Procedures, a copy of which is attached hereto. In addition, to prevent the filing of unnecessary motions, five (5) days prior to the deadline for filing summary judgment motions (or 85 days prior to jury selection) Plaintiffs' counsel are to serve upon all parties to a case, a 'Dismissal Letter' indicating all defendants which Plaintiff will voluntarily dismiss from that case.

All other motions, including motions for *forum non conveniens*, motions to amend complaints, motions to compel, motions to enforce settlements, etc., shall be filed in accordance with the Revised Mass Tort Motion Procedures, a copy of which is attached hereto.

## **VI. TRIAL SCHEDULING**

The dates for all scheduled trials will be published each Monday in *The Legal-Intelligencer*.

## **VII. DEADLINES FOR CASES THAT MOVE TO NEW TRIAL GROUPS**

If any case is moved, with the consent of the Court, from its original trial group to a later trial group, all discovery and motions deadlines for the later group will apply. Any summary judgment motions filed prior to moving the case will be considered moot and must be re-filed in accordance with the deadlines for the group to which the case has been moved, except for cases where the motion deadline for the new group has already passed at the time the case is moved. For those cases, motions will remain open and need not be re-filed. Those motions remaining open shall be decided by the Coordinating Judge in accordance with the deadlines for the new group.

## **VIII. CALL OF THE LIST**

A brief call of the asbestos list will be conducted every Monday at 11:00 a.m. The Court will conduct general asbestos business and call those cases listed for trial for the following month. Knowledgeable representatives of each party involved in the next month's scheduled trials shall attend.

A meeting of the Asbestos Kitchen Cabinet will be conducted on the first Monday of each month, following the call of the list.

## **IX. SANCTIONS**

Failure to comply with any deadlines set forth in the Case Management Order may result in the imposition of appropriate sanctions, including dismissal.

**BY THE COURT:**

**ARNOLD L. NEW  
TEAM LEADER**

**McSHEA LAW FIRM, P.C.**

BY: John P. McShea

Pa. Attorney I.D. No. 34562

Centre Square, West Tower

1500 Market Street, 40<sup>th</sup> Floor

Philadelphia, PA 19102

215-599-0800

Attorneys for Defendants

CBS Corporation and General

Electric Company

<b>KENNETH E. BRADLEY and KATHLEEN BRADLEY,</b>	<b>COURT OF COMMON PLEAS PHILADELPHIA COUNTY</b>
<b>Plaintiffs,</b>	
<b>v.</b>	<b>DECEMBER TERM, 2017 NO. 3217</b>
<b>CBS CORPORATION and GENERAL ELECTRIC CO., <i>et al.</i>,</b>	
<b>Defendants.</b>	<b>ASBESTOS CASE</b>

**NOTICE OF FILING NOTICE OF REMOVAL**

TO THE OFFICE OF JUDICIAL RECORDS

and


PLAINTIFFS, KENNETH E. BRADLEY AND KATHLEEN BRADLEY,

BY AND THROUGH THEIR ATTORNEY OF RECORD:

PLEASE TAKE NOTICE that on June 6, 2019, defendants CBS Corporation and General Electric Company filed a Notice of Removal with the United States District Court for the Eastern District of Pennsylvania to remove the above-captioned action from the Court of Common Pleas of Philadelphia County, Pennsylvania to the United States District Court for the Eastern District of Pennsylvania.

You are also advised that a copy of the Notice of Removal (without exhibits) is attached hereto as **Exhibit A**

Respectfully submitted,

  
John P. McShea  
McSHEA LAW FIRM, P.C.  
Centre Square, West Tower  
1500 Market Street, 40<sup>th</sup> Floor  
Philadelphia, PA 19102  
215-599-0800

Attorneys for Defendants  
CBS Corporation and  
General Electric Company